

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JHSHYR YIH,

Plaintiff,

-against-

TAIWAN SEMICONDUCTOR  
MANUFACTURING COMPANY,

Defendant.

**No. 7:21-cv-08828  
ECF Case**

**NOTICE OF MOTION BY DEFENDANT TAIWAN SEMICONDUCTOR  
MANUFACTURING COMPANY TO DISMISS THE COMPLAINT PURSUANT TO  
FED. R. CIV. P. 12(b)(2) AND 12(b)(6)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Weinwei Chang and accompanying exhibits, the Declaration of Hen-Yih Chao, the Declaration of Chuan-Cheng Hung, and all other documents filed herein, Defendant Taiwan Semiconductor Manufacturing Company (“TSMC”), by and through undersigned counsel moves this Court to issue an Order dismissing Plaintiff’s Complaint with prejudice pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure because this Court does not have personal jurisdiction over Plaintiff’s claims, and pursuant to Rule 12(b)(6) for failure to state a claim upon which relief can be granted. Argument, if any, will be heard on a date and at a time designated by the Court.

Dated: New York, New York  
December 10, 2021

Respectfully submitted,

/s/ Jessica Kastin  
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